

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Luis Roberto Martinez-Trevino

Principal

206 183 445

YOB:

1989

Mexico

United States District Court
Southern District of Texas
FILED

Case Number:
M-15-0483-M

MAR 31 2015

(Name and Address of Defendant)

Clerk of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about March 29, 2015 in Hidalgo County, in the Southern District of Texas defendants(s) did,

(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Yesli Azucena Martinez-Trevino and Veronica Del Transito Ruano-Chavez, citizens and nationals of El Salvador, along with thirteen (13) other undocumented aliens, for a total of fifteen (15) who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport, by foot, said aliens in furtherance of such violation of law within the United States, that is, from a location near Progreso, Texas to the point of arrest near Progreso, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On March 29, 2015 at approximately 11:00 pm, Border Patrol Agent Pedro Garcia was assigned to line watch operations near Progreso, Texas approximately two miles west of the Progreso Port of Entry. BPA P. Garcia responded to possible traffic in the general area. BPA P. Garcia identified himself as a Border Patrol Agent and questioned the subjects as to their citizenship and immigration status. All seventeen (17) subjects freely admitted to being illegally present in the United States from varying countries of origin. The subjects also admitted to not having or possessing any documentation that would allow them to enter or remain in the United States legally. The group, was then transported to the McAllen Border Patrol Station in McAllen, Texas for further processing.

At the McAllen Border Patrol Station, biometric data was taken from every member of the group and through these checks and further investigation, MARTINEZ-Trevino, Luis Roberto was identified as the foot guide.

SEE ATTACHED:

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

approved by
A084 K + 9 R



Signature of Complainant

Michael Chandler Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

March 31, 2015

Date

at McAllen, Texas

City and State

Dorina Ramos, U. S. Magistrate Judge

Name and Title of Judicial Officer



Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-15-0483-M

RE: Luis Roberto Martinez-Trevino

206 183 445

CONTINUATION:

MIRANDA RIGHTS:

Once at the McAllen Station, principal Luis Roberto MARTINEZ-Trevino, and material witnesses Yesli Azucena MARTINEZ-Araniva, and Veronica Del Transito RUANO-Chavez were advised of their Miranda Rights in Spanish language and all subjects acknowledged they understood their rights.

STATEMENT OF PRINCIPAL, MARTINEZ-Trevino, Luis Roberto:

Luis Roberto MARTINEZ-Trevino, a citizen and national of Mexico, admitted that he was guiding the group of 15 illegal aliens into the United States. He stated that he had been offered \$100.00 USD per person to guide the group to a predetermined location on Military Road in Progreso, Texas. MARTINEZ also divulged that he was working for a subject known as "La Flama." He stated that he has attempted to smuggle illegal aliens into the United States before, but that he has been unsuccessful every time. Furthermore, he stated that he intended to use the illegal proceeds to care for his United States children who reside in Weslaco, Texas. He also disclosed that the intended load vehicle driver is called Richard and that he drives a black Ford Explorer.

NOTE: MARTINEZ-Trevino was previously involved as a principal in a 1 on 22 Administrative Alien Smuggling Case, but was not prosecuted due to lack of viable material witnesses.

STATEMENT OF MAT WITNESS MARTINEZ-Araniva, Yesli Azucena:

MARTINEZ, a citizen and national of El Salvador, stated her family paid approximately \$7000 USD to be smuggled into the United States. MARTINEZ stated that she first encounter the foot guides in Mexico before crossing into the United States on March 29, 2015 at approximately 10:00 pm. MARTINEZ stated that Luis Roberto Martinez-Trevino identified himself as the foot guide before crossing the Rio Grande River. MARTINEZ stated the older of the two foot guide provided instructions to the group to follow him in a straight line by pairs. MARTINEZ stated the older foot guide also was possibly smoking marijuana and proceeded to talk on his cellphone throughout their journey into the United States. MARTINEZ stated she does not know who the older foot guide was talking to on his cellphone. MARTINEZ stated the older foot guide claimed that a pickup truck as the load vehicle and the group of apprehended to say anything about him being the foot guide. MARTINEZ was able to describe the older foot guide as a Hispanic male wearing a gray sweater. Yesli Azucena MARTINEZ-Araniva was shown a DHS/CBP/ Photo Spread Sheet and successfully identified, Luis MARTINEZ-Trevino, as the older foot guide of the group.

SWORN STATEMENT OF MAT WITNESS RUANO-Chavez, Veronica Del Transito:

Veronica Del Transito RUANO-Chavez, a citizen and national of El Salvador, was to pay a total of \$8,500.00 dollars of which of \$5,000.00 dollars has been paid. Ruano stated that a total of seventeen undocumented aliens that crossed the Rio Grande River. Once on the United States side the waited by the river bank three hours before the foot guide instructed them to get up and follow him. After crossing the river, the foot guide instructed the group to stay in a straight line and following him. Ruano stated that the foot guide had cell phone and was apprehended with the group. RUANO was able to identify the foot guide in a six picture photo lineup.